

**AFFIDAVIT OF SPECIAL AGENT LINA AWAD
IN SUPPORT OF A CRIMINAL COMPLAINT**

I, LINA AWAD, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), currently assigned to the Office of the Special Agent in Charge (SAC), Boston, Massachusetts. I am authorized to investigate crimes involving violations of Title 18, Title 8, and Title 19 of the United States Code (USC). I have been employed as a HSI Special Agent since February 2009. I am a graduate of the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, where I received training to become a federal agent; specifically, I received certification in the Criminal Investigator Training Program and the ICE Special Agent Training Program. I received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other law enforcement agencies, including the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), Federal Bureau of Investigation (“FBI”), United States Drug Enforcement Administration (“DEA”), the Massachusetts State Police (“MSP”), Rhode Island State Police (“RISP”), the Police Departments of local communities including Boston and the United States Attorney’s Office for the District of Massachusetts. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes

occurring in Massachusetts, nationally, and abroad.

3. Based on my training and experience, I am aware that 18 U.S.C. §1591 makes it a federal offense for any person to knowingly recruit, entice, harbor, transport, provide, obtain, or maintain by any means a person -- or benefit financially or by receiving anything of value from participating in a venture, which has engaged in said acts -- in or affecting interstate commerce, 1) knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act; or 2) knowing that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act. I am also aware that under 18 U.S.C. § 1591(c), if the defendant had “a reasonable opportunity to observe the person so recruited, enticed, transported, provided, obtained or maintained, the Government need not prove the defendant knew the person had not attained the age of 18 years.” I am aware that 18 U.S.C. §1594 makes it a federal offense to attempt to commit any violation of 1591. I am further aware that pursuant to 18 U.S.C. §2423, it is a federal offense for a person to knowingly transport an individual who has not attained the age of 18 years in interstate commerce, with intent that such individual engage in prostitution.

PURPOSE OF THE AFFIDAVIT

4. I make this affidavit in support of a complaint charging that, on or about October 24 and 25, 2013, in Brockton, Malden and Boston, Massachusetts, and Providence, Rhode Island, and elsewhere, ANTHONY PLEDGER a/k/a “Jaden,” a/k/a “Polo B,” engaged in sex trafficking of minors or by force, fraud and coercion, in violation of 18 U.S.C. §§1591, attempted sex trafficking of minors, in violation of 18 U.S.C. §1594, and transported minors in interstate commerce for the purpose of prostitution, in violation of 18 U.S.C. §2423.

5. The statements contained in this affidavit are based on my own investigation, my

review of reports, information that I have received from a variety of other sources, including public records, my analysis of reports prepared by other officers, and information provided to me by other law enforcement officers. This affidavit is submitted for the limited purpose of establishing probable cause to believe that ANTHONY PLEDGER a/k/a "Jaden," a/k/a "Polo B," engaged in sex trafficking of minors, in violation of 18 U.S.C. §1591, attempted sex trafficking of minors, in violation of 18 U.S.C. §1594, and transportation of minors in interstate commerce for the purpose of prostitution, in violation of 18 U.S.C. §2423. It therefore does not set forth all of the information that I and other law enforcement personnel have obtained during the course of this investigation.

PROBABLE CAUSE

6. In or about October, 2013, a female minor, born in 1997, referred to herein as "N.F.," was contacted by a male she knew as "Polo B" or simply as "Polo" on TAGGED, which is a social media website that permits users to send messages to one another.¹ Over a period of approximately less than two weeks, N.F. communicated with Pledger, who used the account name "Polo B," over the TAGGED site.

7. In those communications, among other things, Polo gave his telephone number to N.F. and asked N.F. to meet with him. For example, PLEDGER sent the following communications to N.F. on TAGGED:²

- a. "u going to school tomorrow? and i was serious about getting money and seeing the world thts what i do";
- b. "im not saying go out go out but come out side and chill wit me how else r we

¹ I have viewed records of the account for "Polo B," which includes "User Uploaded Photos." I recognize the person in those photographs as PLEDGER. N.F. later identified the man that she knew as "Polo" as PLEDGER.

² Unless otherwise noted, all quotes from electronic communications are verbatim.

gonna gin trust”;

- c. “let take trips and make rackz³ and go shopping”;
- d. “r we getting up today”;
- e. “lets link up”; and
- f. in response to N.F.’s statement that she was in class, “u want to stay or u want me to come get u”.

8. At one point, N.F. asked if PLEDGER knew her age. PLEDGER wrote: “ya 18 right.” N.F. said, “lol no.. im 17 and cause”. In fact, N.F. was only 16 years old.

9. PLEDGER also suggested that N.F. engage in prostitution. For example, the following exchange took place on TAGGED:

PLEDGER: “instead of fucking for free i kno ppl that will pay us”

N.F.: “Are you crazy. Lol me fucking niggas?? I’m a virgin I dont know shit.

PLEDGER: “we can make between 6 to 10 grand a month”

N.F.: “That sounds good and all but idk if I can do it..”

PLEDGER: “ill teach u everything u should kno and i put u in ya own car crib whateva u want”

....

PLEDGER: “yo let me tell u sum real shit... if u fuck wit me ill turn u into a boss bitch not saying ya not already one but its level to this shit.. ill make u my star show u not only the world but show u what it like to have ya own and kno whats important in life”

N.F. “Whats the catch tho?”

PLEDGER: “it is no catch”

³ “Rackz” is a slang term for money (in thousand dollar amounts).

PLEDGER: "we get bread and live how we want"

N.F.: "Okay so how much would I get for each nigga?"

PLEDGER: "like its not a fantasy"

PLEDGER: "between 200\$ or 300\$ a hour and u never stay the whole hour"

PLEDGER: "last night we made a grand on my mother"

N.F.: "What if the niggas wont pay.."

PLEDGER: "i get crazzzzzzy.. lol u dont worry u get out the way and i get wit shit.. but to be honest i dont fuck wit thugs and shit.."

PLEDGER: "they always pay"

PLEDGER: "i don't have them type of problems"

N.F.: "Lol im scared.."

N.F.: "Are you just gonna leave me there with them?"

PLEDGER: "hellllllll noooooo r u crazy.."

PLEDGER: "thts y u should jus co e chill wit me for the night and watch and let me jus teach u"

PLEDGER: "come"

10. PLEDGER also referred to having other prostitutes. N.F. asked PLEDGER if he would have his "hoe," which is a slang term for prostitute, with him. PLEDGER replied: "dont call them that have respect dont deal wit hoes i deal wit woman tht kno what they want and life and ready to get it by all mean... hoes dont get paid they get laid".

11. PLEDGER asked N.F. to introduce him to her friend, also a female minor, born in 1997, referred to herein as "K.W." On or about October 20, 2013, the following exchange took place on TAGGED:

N.F.: "You tryna chill with me and my cousin⁴ saturday? Or friday?"

PLEDGER: "yea i dont care"

N.F.: "Okay:)"

PLEDGER: "we gonna get drunk and high"

N.F. "Yeahh. My cousin wants you to hit her up."

PLEDGER: "what she want to talk about?"

N.F.: "What we talked about earlier.. she wants to do it"

PLEDGER: "is she as pretty as u"

N.F.: "Shes in my pics lol"

PLEDGER: "let me see.. how old is she"

PLEDGER: "send me a pic of her i cant see her like that"

N.F.: "Shes 18.. & I cannt. She has a tagged.."

N.F.: "Whats your #?"

PLEDGER: "617 905 1999"

N.F.: "Did you get them yet?"

PLEDGER: "no bby"

N.F.: "Ohh well shes the one sending them so idk."

N.F. gave PLEDGER's telephone number to K.W.

12. PLEDGER, whom K.W. knew as "Jaden," communicated with K.W., including by text message to K.W.'s telephone from his telephone, 617-905-1999; and by telephone calls to K.W. from 617-905-1999.⁵ PLEDGER asked K.W. about school and her age; K.W. said that she

⁴ N.F. often referred to K.W. as her "cousin," although the two are not related.

⁵ I know K.W.'s telephone number and have reviewed records of these communications but decline to list it here for fear of identifying the minor victim.

was 18, when in fact she was 15. As with N.F., PLEDGER requested to meet with K.W. in person. At PLEDGER's request, K.W. sent naked or partially naked photos of herself to PLEDGER.

13. K.W. agreed to meet PLEDGER on or about Thursday, October 24, 2013. On the afternoon of October 24, 2013, PLEDGER met K.W. in Brockton, Massachusetts. PLEDGER was driving a gray Toyota RAV4 (the "gray Toyota") and a second man, hereinafter John Doe,⁶ was in the passenger seat. PLEDGER asked K.W. to get into the car. She initially refused, which caused PLEDGER to become angry and insistent. K.W. eventually got into the gray Toyota with PLEDGER and Doe.

14. As they were leaving, K.W. said that she did not want to go home. PLEDGER said he would bring K.W. home but then took K.W. to Boston instead. .

15. PLEDGER drove K.W. and Doe into Boston, where they made several stops. PLEDGER brought Doe to a store where he picked up a phone and dropped Doe in Dorchester, leaving PLEDGER alone with K.W. PLEDGER then picked up marijuana and provided marijuana to K.W. At some point during this time, PLEDGER had purchased a bottle of liquor and gave some to K.W. PLEDGER also stopped at a gasoline station in Boston. While in Boston, K.W. asked PLEDGER to take K.W. home.

16. After K.W. was discovered missing, K.W.'s mother sent text messages to PLEDGER from multiple telephones, asking PLEDGER to bring K.W. home. K.W.'s mother asked PLEDGER to "please drop her at the nearest train or bus station and i will pick her up" and to "please answer the phone". K.W.'s mother then texted PLEDGER that she was looking for her "15 yr. Old babygirl." PLEDGER denied knowing her. K.W.'s mother texted back that she had

⁶ I know the identity of John Doe, whom K.W. has identified from a photographic array.

seen PLEDGER's number in her call log. PLEDGER again denied having seen K.W. K.W.'s mother said that she had filed a missing person report. PLEDGER denied being present with her, saying that "if i hear from her ill have her call."

17. While in Boston, after the exchange of text messages with K.W.'s mother, PLEDGER parked the gray Toyota, told K.W. to get into the back and joined her there. PLEDGER had sexual intercourse with K.W. in the back of his vehicle.

18. PLEDGER then took K.W. to his apartment at 202 Jewett Street in Providence, Rhode Island. At the apartment in Providence, K.W. met a female, hereinafter "E.S." K.W. spent the night at PLEDGER's apartment in Providence. PLEDGER had sexual intercourse with K.W. again that night.

19. The next morning, October 25, 2013, K.W. told PLEDGER that she wanted to go home. PLEDGER refused to take her home. PLEDGER allowed K.W. to contact her friend N.F. K.W. told N.F. that she was scared. N.F. agreed to meet with K.W. PLEDGER drove K.W. to Malden and picked up N.F. On the way to Malden, PLEDGER drove K.W. past her home in Brockton but did not stop or take K.W. home.

20. After picking up N.F., PLEDGER drove K.W. and N.F. into Boston. They picked up John Doe and a white female in Dorchester. PLEDGER drove Doe and the female prostitute to the Dedham Marriott. During the drive, the female told the girls that she was a prostitute, had been PLEDGER's prostitute, and was going to make some money that night.

21. PLEDGER then drove K.W. and N.F. to Providence. PLEDGER said that he could purchase sexy clothing for K.W. so that she could work at the hotel, which was a reference to prostitution. PLEDGER said that they could make a lot of money. PLEDGER said that they had a lot to learn.

22. PLEDGER, K.W. and N.F. returned to the apartment in Providence. At the apartment, PLEDGER confronted K.W. about messages that he had received from K.W.'s mother stating that K.W. was only 15 years old. PLEDGER ordered K.W. to conduct a Google search to determine if she was a missing person. K.W. saw text messages on PLEDGER's phone from females, which messages she believed were about prostitution. PLEDGER offered marijuana to K.W. and N.F, which they refused. N.F. asked PLEDGER to take her home; PLEDGER said not to worry. Later, N.F. again asked to go home and PLEDGER said that he would bring her home when he wanted to.

23. Later that evening, members of the Providence and Brockton Police Departments arrived at Jewett Street in search of K.W.⁷ Upon seeing the police in the area for the first time, PLEDGER took the battery out of his cell phone and told K.W. and N.F. to go upstairs and wait. PLEDGER then went upstairs and instructed K.W. and N.F to come back down stairs and go hide in his vehicle. When the police left the area, PLEDGER moved them to the cellar. Shortly after, the police came back into the area. Officers saw the gray Toyota at PLEDGER's apartment, saw E.S. leaving the apartment, and spoke to E.S. Police showed a picture of K.W. to E.S., who denied knowing her, although E.S. had met K.W. who was present in the apartment at that time. While officers questioned E.S., another officer walked down the driveway, saw a light on in the cellar, and saw in the cellar two young black females, who were identified as K.W. and N.F. Officers moved to the rear of the building.

24. PLEDGER opened the back door and pushed K.W. and N.F. out of the house, where they were recovered by the police. PLEDGER remained in the house; officers saw him moving through the house, operating a computer, and changing his shirt, among other things.

⁷ Officers had used GPS data for PLEDGER's telephone to track PLEDGER to Jewett Street.

PLEDGER walked out of the front door and stood on the porch. PLEDGER said "I didn't do anything with those girls. I didn't do anything wrong. I didn't know they were fourteen, they told me they were eighteen." The police arrested PLEDGER and advised him to be silent. PLEDGER then said, "I didn't do anything with them. I didn't kiss them, hug them, touch them. I didn't have sex with them." PLEDGER identified himself by name, gave an address in Dorchester, and said that he had met the girls on "Tag.com."

CONCLUSION

25. Based on the foregoing, I submit that there is probable cause to believe that, on or about October 24 and 25, 2013, ANTHONY PLEDGER a/k/a "Jaden," a/k/a "Polo B," engaged in sex trafficking of minors, in violation of 18 U.S.C. §1591, attempted sex trafficking of minors, in violation of 18 U.S.C. §1594, and transportation of minors in interstate commerce for the purpose of prostitution, in violation of 18 U.S.C. §2423.

Respectfully submitted,

Lina Awad
LINA AWAD
SPECIAL AGENT
HOMELAND SECURITY
INVESTIGATIONS

Subscribed and sworn to before me
on January 9, 2014
Date

Jennifer C. Boal
JENNIFER C. BOAL
UNITED STATES MAGISTRATE JUDGE

